IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Serial No. 10/017,469
Filing Date ....December 14, 2001
Inventorship... Nirkhe
Assignee...Microsoft Corporation
Group Art Unit 2151
Examiner ....K.Q. Dinh
Attorney's Docket No. MS1-0928US
Title: User Name Mapping

APPELLANT'S REPLY BRIEF

TO EXAMINER'S ANSWER MAILED JULY 10, 2008

To: Honorable Commissioner of Patents
        P.O. Box 1450
        Alexandria, VA 22313-1450

From: Brian J. Pangrle
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        Appellant hereby files a Reply Brief to the Examiner's Answer of July 10,

2008. Appellant's Opening Appeal Brief of April 28, 2007 seeks review of the

grounds of rejection in the Final Office Action of October 30, 2006.

Reply to Argument

Heading (10) of the Examiner's Answer (at page 14) sets forth the

following, relisted as A, B, C and D:

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A.   Appellant asserts that the prior Art (Blakely) teaches away does not support motivation.

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Examiner respectfully disagrees. Examiner respectfully point out that Blakely also suggests providing user access to resources on servers with different operating systems such as DOS, OS/2, Macintosh (see col. 1 lines 19-40). Therefore, Blakley (the primary reference) also supports the motivation to combine the references.

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B.   Appellant asserts that the proposed modification would change principle of operation.

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Examiner respectfully point out that it would have been obvious to one of the ordinary skill in the art at the time the invention was made to implement Smith's teachings into the computer system of Blakley to manage network communication in different network operating systems because it would have allowed users to retrieve and to display web documents from different operating systems in a communication network (see Smith's col.6 lines 11-32). Examiner provided the good motivation to combine the references of Blakely and Smith as shown in the secondary reference (Smith). Therefore, Examiner respectfully submits that the proposed modification would not change the principle of the operation.

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C.   Appellant asserts that the evidence insufficient to support reasonable expectation of success.

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Examiner respectfully point out that it would have been obvious to one of the ordinary skill in the art at the time the invention was made to implement Smith's teachings into the computer system of Blakley to manage network communication in different network operating systems because it would have allowed users to retrieve and to display web documents from different operating systems in a communication network (see Smith's col.6 lines 11-32). Examiner has provided a sufficient motivation to

combine the references of Blakely and Smith as shown in the
secondary reference (Smith). Therefore, the Appellant's arguments
are not persuasive.

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        *D.   Appellant asserts that the Blakely reference does not
disclose a map on a mapping server.*

        Examiner respectfully point out that Blakely reference
10   discloses a map on a mapping server (Gateway Server 28 fig. 1)
[implementing the Gateway Server to control users' access to the
subsystems (network 8 and network 10 of fig. I) and using the
operating system for mapping unique pairs (user handles and user
names) into its own view with users' credentials and access
15   privileges when users access to all security subsystems on the
system, see abstract, figs. 1 , 2, 3A, col. 3 line 14 to col. 4 line 57
and col. 5 lines 1-28]. The purpose of the mapping function is to
ensure that the user names representing the same users to all
security subsystems on the system.
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Reply to A: Teaches Away

The Office states that "Blakely also suggests providing user access to

resources on servers with different operating systems such as DOS, OS/2,

25   Macintosh (see col. 1 lines 19-40)".

The cited evidence in the Blakely reference at col. 1, lines 19-40 is as

follows:

        Many computer applications typically were written for operating
        systems that did not provide any security. The designers of these
30   applications realized that a security system would be useful for
        certain clients and so the designers added security systems to
        their applications. Some of these applications are server programs
        that allow users to access resources on that server and to run
        processes on the server on their behalf. Some examples of
35   operating systems without initial security measures are DOS,
        OS/2, and Macintosh OS.

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In the case for OS/2, some examples of processes that allow
users access include TELNET, OS/2, LAN SERVER, and
NETRUN. TELNET is a program that allows multiple users to log
in across a network and access an OS/2 TELNET server as if they
were sitting in front of it. TELNET is part of the OS/2 TCP/IP
offering. OS/2 LAN SERVER is a program that grants remote
users access to resources such as, for example, files, print
queues, and serial devices, on an OS/2 LAN SERVER. The
NETRUN program allows remote users to execute processes on
their behalf on an OS/2 LAN SERVER. Each of these programs
has its own security measures.

Appellant has examined the evidence and finds that the Blakely

reference teaches a "method and system for providing a user access to multiple

15   secured subsystems" (title) under a single operating system. Indeed, the

solution of the Blakely reference is explicitly a single operating system that

unifies security protocols for each user (see col. 2, lines 31-37).

The evidence cited by the Office in the Examiner's Answer makes this

clear. Specifically, the Blakely reference teaches a security problem associated

20   with individual operating systems ("[s]ome examples of operating systems

without initial security measures are DOS, OS/2, and Macintosh OS") and then

provides a detailed example of for the OS/2 operating system.

The cited portion of the Blakely reference explicitly states "TELNET is

part of the OS/2 TCP/IP offering". Appellant submits that with TELNET (circa

25   1994), one logs on to a target computer as a regular user. In such an example,

even if the target computer had multiple operating systems, TELNET would

require a user to log on to the target computer under each separate user

account for each operating system.

Appellant submits that the Office has not argued modification of the

TELNET command and protocol system for log on to a target computer with

multiple operating systems. Appellant further submits that the Office has not

argued modification of the TELNET system for using a single log on "user

5   name" to log on to a target computer with one operating system and to log on to

another target computer with a second, different operating system. Yet further,

Appellant submits that the Office has not argued modifying the TELNET system

to use a "user name" to log on to a first network that uses a first operating

system and to log on to a second network that uses a second, different

10   operating system.

The three sentences of the foregoing paragraph demonstrate how

convoluted and tenuous the logic would be to jump from the cited evidence to

the claimed subject matter. In other words, Appellant finds the TELNET system

of col. 1, lines 19-40 as the best evidence; however, as demonstrated above,

15   this evidence falls short.

Appellant contends that the Office is relying on perhaps the "worst

evidence" to make a *prima facie* case under §103, as the evidence of DOS,

OS/2 and Macintosh OS in the Blakely reference is provided solely to

emphasize security issues associated with these individual operating systems.

20   When the OS evidence is combined with the single operating solution (col. 2,

lines 31-37 and see also col. 4, lines 19-20 ("[a]ll these systems [applications

and the proposed mechanism for secure access to these applications] coexist

under a single operating system")), Appellant concludes that the Blakely

reference teaches away from any type of solution associated with more than

one type of OS (see MPEP §2145, "[i]t is improper to combine references

where the references teach away from their combination").

5   Appellant also directs the Board to the Opening Appeal Brief, which

provides a more detailed analysis of the evidence.

Reply to B: Change Principle of Operation

          The Office states that "it would have been obvious . . . to implement

10   Smith's teachings into the computer system of Blakley to manage network

communication in different network operating systems because it would have

allowed users to retrieve and to display web documents from different operating

systems in a communication network (see Smith's col. 6 lines 11-32)".

          In Appellant's Opening Appeal Brief, Appellant stated:

15   If an additional operating system was introduced into the system
          of the Blakely reference, the entire approach for handling
          application specific security issues would become irrelevant. In
          other words, the Blakely reference's system would need to
          operate according to a different principle.
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          As explained in the Opening Appeal Brief, the Blakely reference's OS

associates a user handle (UH) and user name (UN) pair with the user's

credentials for the security measures of the various applications running on the

OS (col. 4, lines 33-58; see "User A" of Figs. 3A and 3B). As explicitly stated:

25   "All these systems [applications and the proposed mechanism for secure

access to these applications] coexist under a single operating system" (col. 4,

lines 19-20).

Again, Appellant finds that any modification to the "single operating

system" of the Blakely reference to account for heterogeneous networks would

5   be primary to the security issues addressed by the Blakely reference, i.e., make

any teachings of problems and solutions to the security issues irrelevant. In

other words, it is likely that any proposed modification to handle heterogeneous

networks would supplant the entire "secure OS" approach.

10   Reply to C: No Reasonable Likelihood of Success

Again, the Office points to combining references to "manage network

communication in different network operating systems because it would have

allowed users to retrieve and to display web documents from different operating

systems in a communication network". When investigating the "best evidence",

15   Appellant fails to find logical links between the single OS TELNET sessions of

the Blakely reference and the stated retrieval and display of "web documents

from different operating systems in a communication network". In other words,

regardless of what the Smith reference discloses, modification of the single OS

TELNET system of the Blakely reference to meet the claimed subject matter

20   would be a significant undertaking. Evidence as to how such an undertaking

could be achieved is lacking. For this reason, Appellant finds insufficient

evidence to support a finding that a reasonable likelihood of success exists.

Hence, the Office's *prima facie* case is faulty.

Reply to D: Map on a Mapping Server

5   The Office contends that the Blakely reference discloses a map on a

mapping server and cites the "Gateway Server 28" of Fig. 1. Per MPEP §2111,

"the pending claims must be 'given their broadest reasonable interpretation

consistent with the specification'." Appellant finds that the Office inappropriately

broadens the claim terms "map on a mapping server" in an effort to find an

10   equivalent in the Blakely reference. The claims provide explicit guidance as to

the meaning of "map" and "mapping". Hence, Appellant submits that the

Office's finding that the single OS system of the Blakely reference (for

associating a user handle and a user name) is a "mapping server" is

unsupported by objective evidence of record.

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Conclusion

          Appellant respectfully requests that the Board reverse the Examiner's

rejection for the specific grounds of rejection identified in the Opening Appeal

Brief. Should any issue remain that prevents furtherance of this Appeal, the

20   Board or Office is encouraged to contact the undersigned attorney to discuss

the unresolved issue.

Respectfully Submitted,

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Dated: Sept. 10, 2008   //Brian J. Pangrle// (signed electronically)

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